





Kira Redmond



Steve Shimek



Gordon Hensley



Kira Redmond

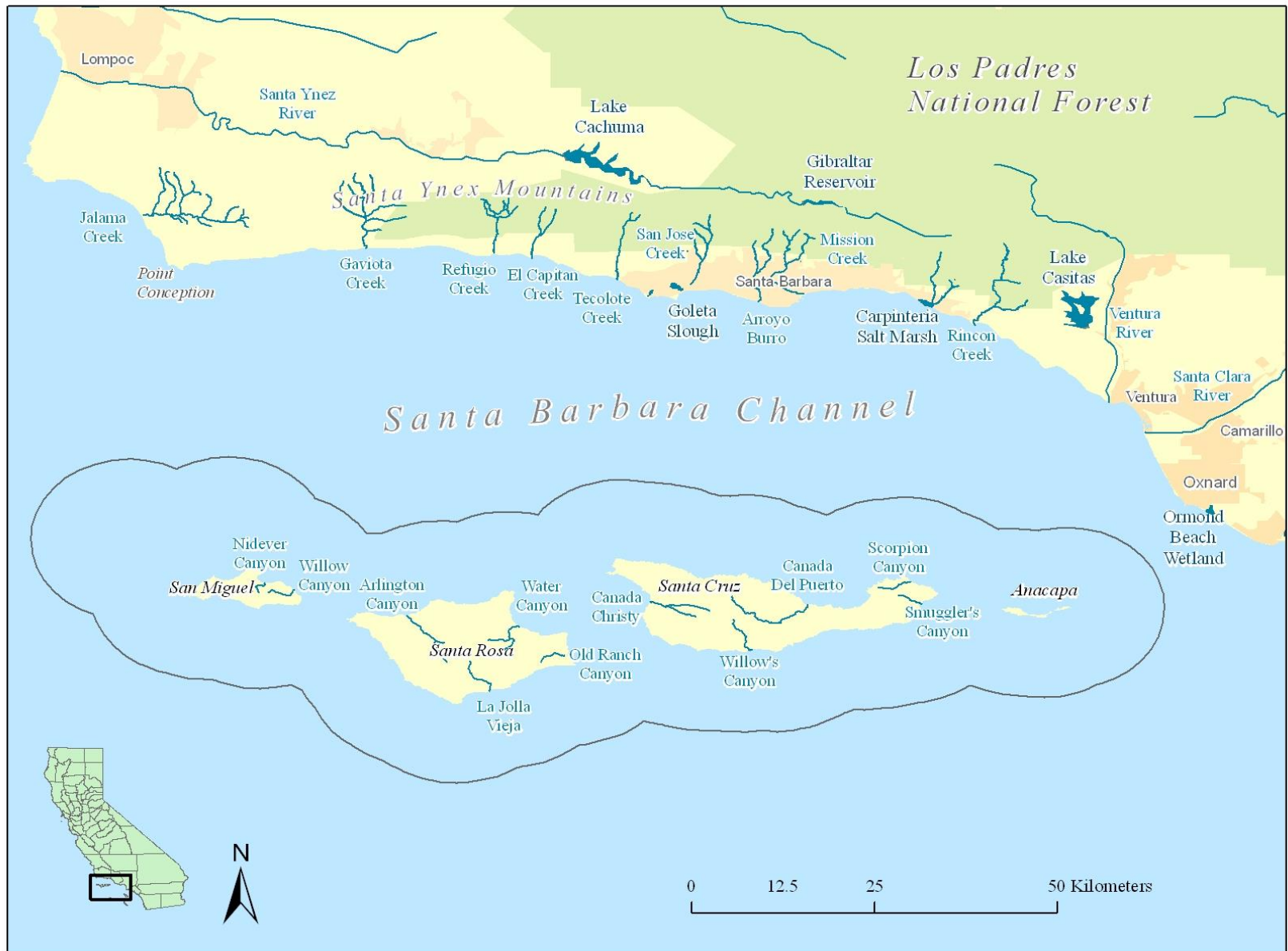


Steve Shimek



Gordon Hensley

Aka: **The “Keepers”**

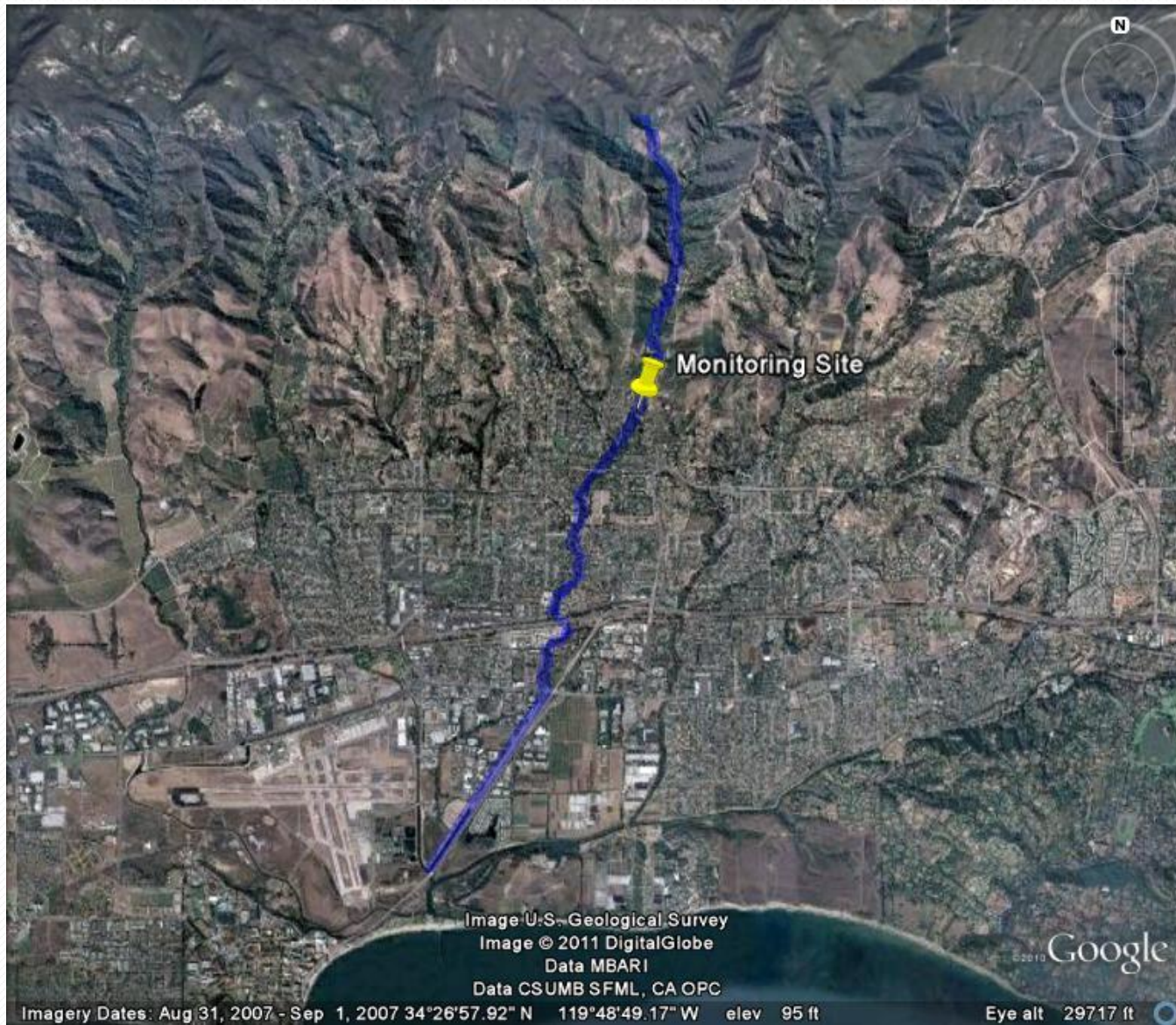


Tier 3

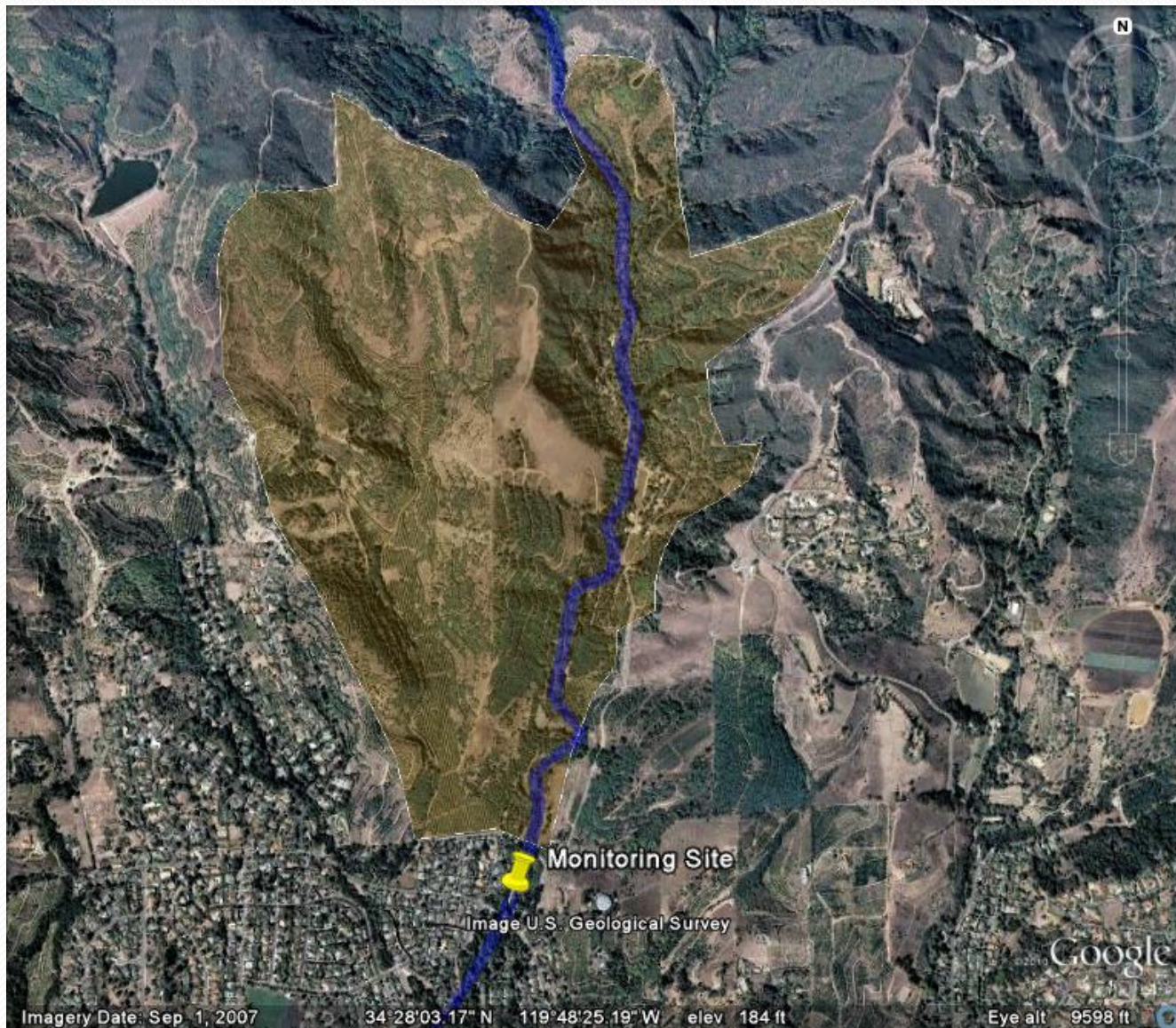
Do either of the following:

- 3a. Grow high nitrogen risk crops AND are greater than 500 acres in operation size
- 3b. Applies chlorpyrifos or diazinon, AND discharges to waterbody 303(d) listed for toxicity or pesticides.

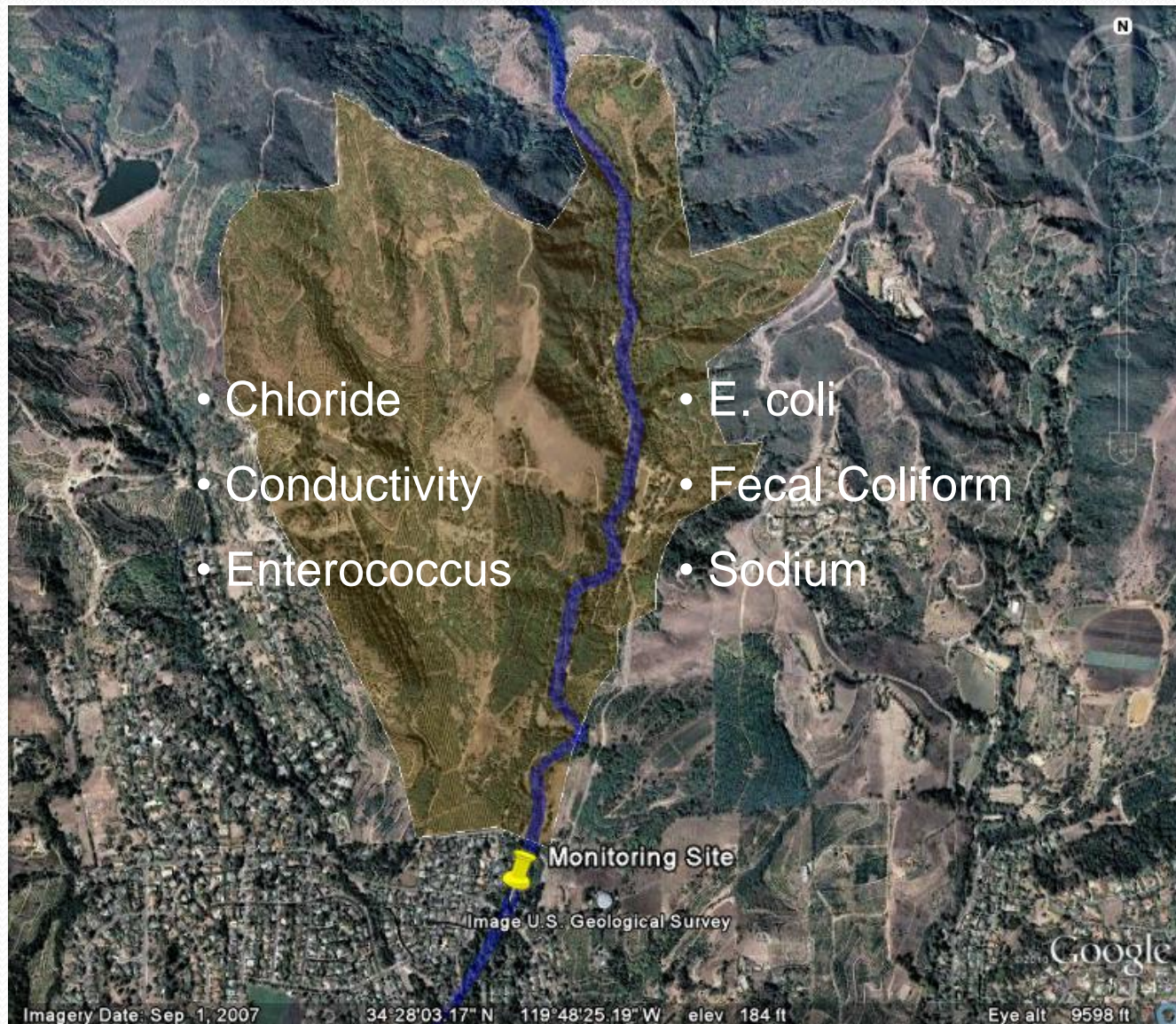
San Jose Creek



San Jose Creek



San Jose Creek



Tier 3?

- N Arroyo Paredon
- N Bell Creek
- N Carpinteria Marsh
- N Glen Annie Creek
- N Franklin Creek
- N Los Carneros Creek
- Carpinteria Creek
- Rincon Creek



Tier 3?

- No Irrigation and Nutrient Management Plans or effectiveness monitoring and reporting
- No individual discharge monitoring for nutrients

Arroyo Paredon



Bell Creek



Carpinteria Marsh

Glen Annie Creek



Franklin Creek



Los Carneros Creek

Carpinteria Creek



Rincon Creek



Tier 3?

- No Irrigation and Nutrient Management Plans or effectiveness monitoring and reporting

- No individual discharge monitoring for nutrients

Arroyo Paredon

Bell Creek

Carpinteria Marsh

Glen Annie Creek

Franklin Creek

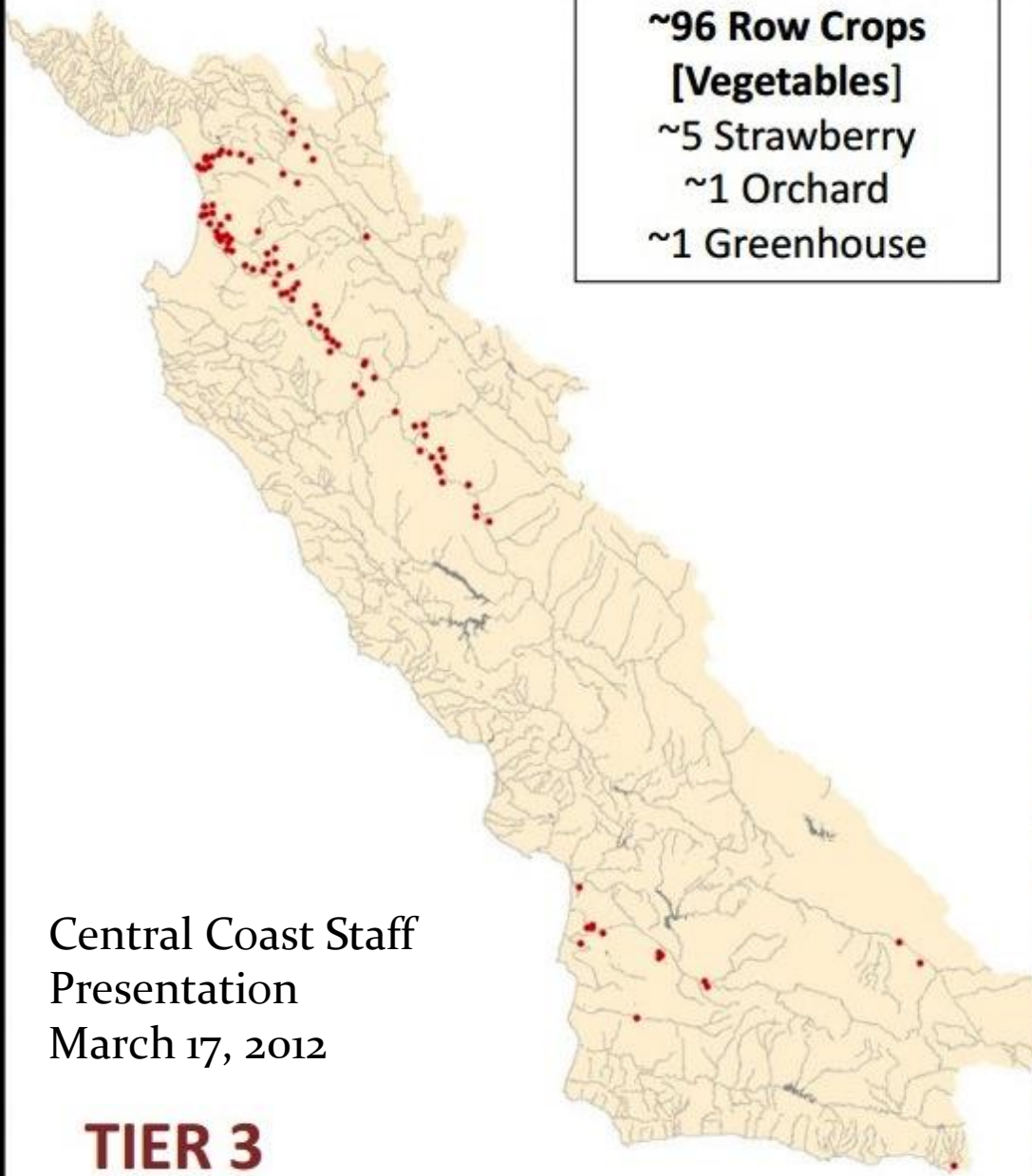
Los Carneros Creek

Carpinteria Creek

Rincon Creek



- No Individual Discharge Monitoring for pesticides or toxicity



**~96 Row Crops
[Vegetables]**
~5 Strawberry
~1 Orchard
~1 Greenhouse

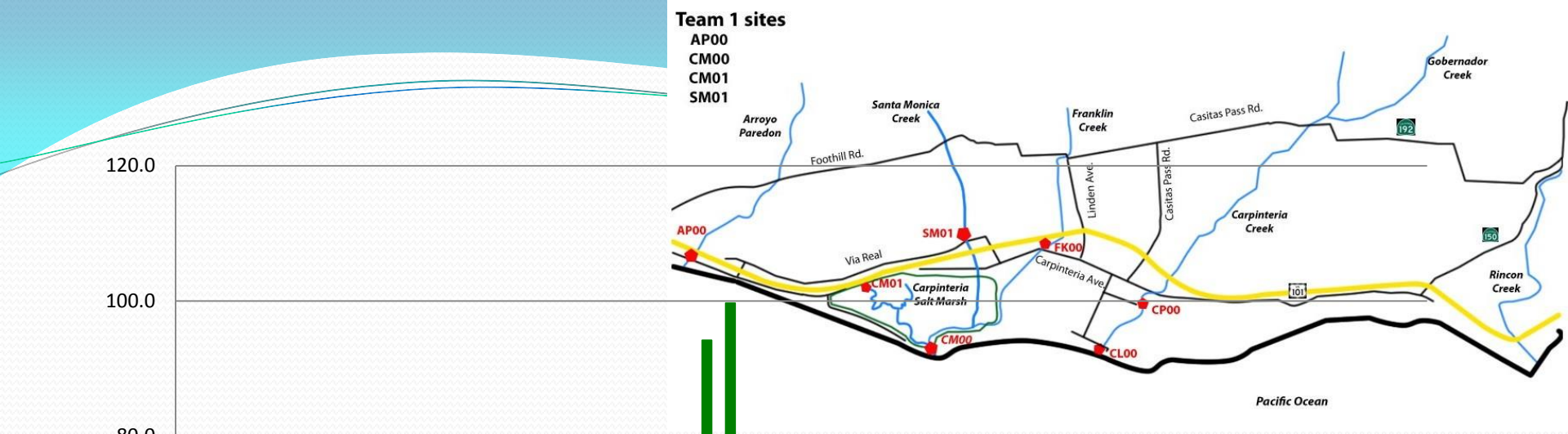
Central Coast Staff
Presentation
March 17, 2012

TIER 3









120.0

100.0

80.0

60.0

40.0

20.0

0.0

Carpinteria Stream Team Nitrate (mg/l)

12/10/11
1/14/12
4/1/12
CMWAP00

4/30/11
5/28/11
6/29/11
8/6/11
8/25/11
12/10/11
1/14/12
4/1/12
CMWCL00

4/30/11
5/28/11
12/10/11
1/14/12
CMWCM00

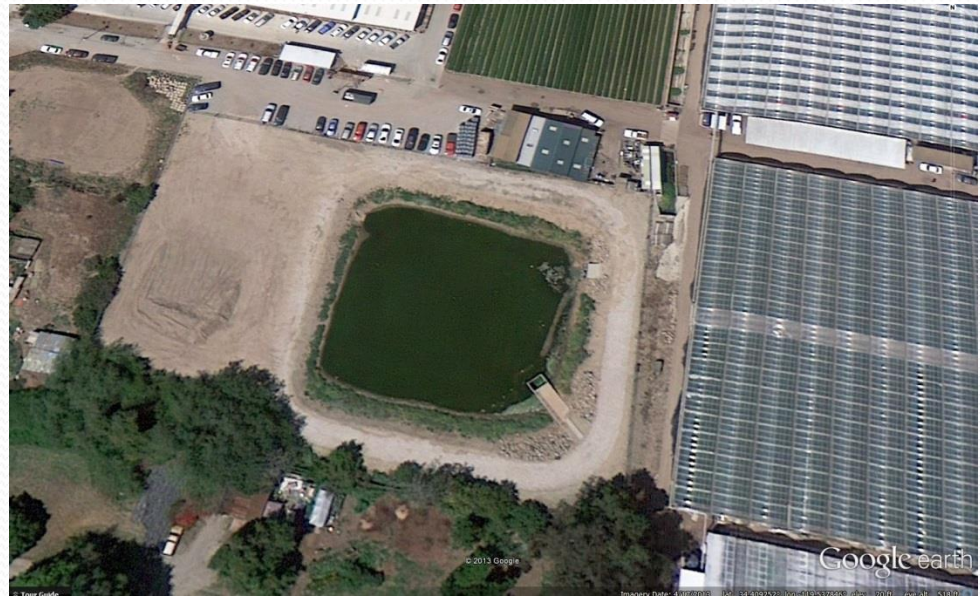
4/30/11
5/28/11
6/29/11
7/29/11
8/25/11
12/10/11
1/14/12
4/1/12
CMWCM01

4/30/11
5/28/11
6/29/11
7/29/11
8/25/11
9/16/11
12/10/11
1/14/12
4/1/12
CMWCP00

4/30/11
5/28/11
6/29/11
7/29/11
8/25/11
1/14/12
4/1/12
CMWFK00

4/30/11
5/28/11
6/29/11
7/29/11
8/25/11
12/10/11
1/14/12
4/1/12
CMWSM01







“Keepers” Petition of the Conditional Waiver of Waste Discharge Requirements Order No. R3-2012-0011 (and MRPs), Petition A-2209(a)

Among the Tier 3 standards proposed by staff, one of the most important was the requirement that Dischargers with High Nitrate Loading Risk farms/ranches meet the nitrate balance ratio targets.

Remedial Nutrient Budget

	Grower One	Grower Two	Grower Three
Crop	Crop A/Crop A	Crop A/Crop A	Crop A/Crop B
Nitrogen lbs / acre fertilizer applied			
Nitrogen in soil and water lbs / ac			
Total Nitrogen “Applied”			

Tells us nothing about the threat to groundwater. In fact, it could lead to misinterpretations

Remedial Nutrient Budget

	Grower One	Grower Two	Grower Three
Crop	Crop A/Crop A	Crop A/Crop A	Crop A/Crop B
Nitrogen lbs / acre fertilizer applied	220	260	270
Nitrogen in soil and water lbs / ac	20	30	40
Total Nitrogen “Applied”	240	290	310

Remedial Nutrient Budget			
	Grower One	Grower Two	Grower Three
Crop	Crop A/Crop A	Crop A/Crop A	Crop A/Crop B
Nitrogen required by crop	240	240	310
Nitrogen lbs / acre fertilizer applied	220	260	270
Nitrogen in soil and water lbs / ac	20	30	40
Total Nitrogen “Applied”	240	290	310
Ratio	1.0	1.2	1.0



SUPPORT

- (A) Dismissal of the due process claims
- (B) The CCRWQCB's appropriate action under 13141 and 13241;
- (C) The SWRCB's finding that the tiering criteria are reasonable;
- (E) Clarification of Farm Practice Effectiveness Compliance (magnitude);
- (F) The SWRCB's affirmation of groundwater monitoring;
- (G) Clarification of Photo Monitoring;
- (I) Affirmation of the Provisions Addressing Nitrogen Application, Item 1 and 2
- (J) Affirmation of the requirement for a water quality buffer plan;
- (K) Clarification of good faith attempts to control pollutant discharges; and
- (L) Clarification of the Annual Compliance Form.

OPPOSE

(D) Containment Structures – Avoid / Minimize.

(I. (3)) Nutrient Management Plan

(I.(4) Nitrogen Balance Ratios, Provision 78)

MORE DISCUSSION

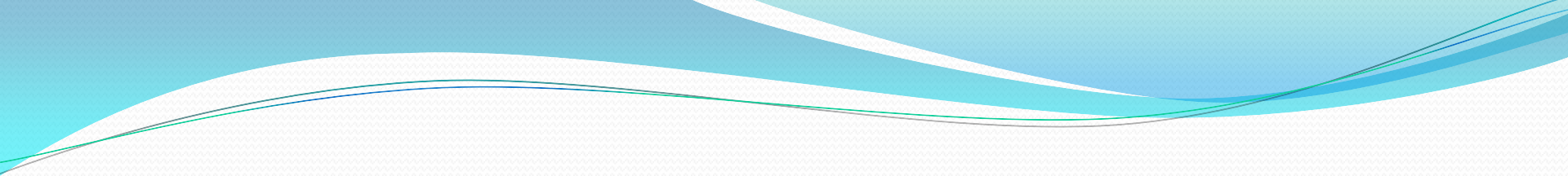
(H) Individual Monitoring

Not monitoring containment structures (strongly oppose);

- Cumulative Loss of Groundwater Protections
 - Eliminate Nitrogen Balance Ratios and Reporting
 - Combined with no monitoring of containment structures
 - = Ineffective Groundwater Protection
- Implementation of ineffective Cooperative Groundwater Monitoring Program



09.15.2009



These impairments are well documented, severe, and widespread. Nearly all beneficial uses of water are impacted, and the discharges causing the impairments continue. Immediate and effective action is necessary to improve water quality protection and resolve the widespread and serious impacts on people and aquatic life.

CCRWQCB